CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Consolidated Grain and Barge Co.
Bluff Road
Mt. Vernon, Indiana 47620

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2, 40 CFR 52.21, and 40 CFR 52.124 (Prevention of Significant Deterioration), with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-3 (Emission Offset), with conditions listed on the attached pages

Operation Permit No.: MSOP 129-12259-00014	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary grain merchandising plant.

Authorized Individual:	Michael R. Brown
Source Address:	Bluff Road, Mt. Vernon, Indiana 47620
Mailing Address:	P.O. Box 547, Mt. Vernon, Indiana 47620-0547
Phone Number:	812 - 838 - 6651
SIC Code:	5153
County Location:	Posey
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, exhausted to stack S-1, controlled by baghouse C-1, capacity: 840 tons of grain per hour.

(b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.

(c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.

(d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour, capacity: 84.0 tons of grain per hour.

(e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.

(f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.

(g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.

(h) Two (2) storage tanks, installed in 1978, capacity: 500 gallons of fuel oil each.

(i) Three (3) natural gas-fired combustion sources, installed in the first quarter of 1978, rated at: 1.0 million British thermal units per hour, each.

(j) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.

(k) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.

(l) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of any criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

(c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit ***to construct and*** operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

Testing Requirements

C.10 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, exhausted to stack S-1, controlled by baghouse C-1, capacity: 840 tons of grain per hour.

(b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.

(c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.

(d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour, capacity: 84.0 tons of grain per hour.

(e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.

(f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.

(g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.

(j) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.

(k) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.

(l) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

(a) Pursuant to 326 IAC 6-3 (Process Operations):

(1) The allowable PM emission rate from P1, P2 and P3, shall not exceed a total of 80.6 pounds per hour when operating at a process weight rate of 1260 tons per hour.

(2) The allowable PM emission rate from P4, shall not exceed 49.5 pounds per hour when operating at a process weight rate of 84.0 tons per hour.

(3) The allowable PM emission rate from P5, controlled by a telescoping spout, shall not exceed 69.0 pounds per hour when operating at a process weight rate of 500 tons per hour.

(4) The allowable PM emission rate from P6A ,controlled by a spout, shall not exceed 64.3 pounds per hour when operating at a process weight rate of 336 tons per hour.

(5) The allowable PM emission rate from P6B, controlled by a spout, shall not exceed 65.6 pounds per hour when operating at a process weight rate of 375 tons per hour.

(6) The allowable PM emission rate from P7 and P8 shall not exceed 64.3 pounds per hour, each, when operating at a process weight rate of 336 tons per hour.

(7) The allowable PM emission rate from P9 shall not exceed 65.6 pounds per hour when operating at a process weight rate of 375 tons per hour.

(b) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) The total emissions of particulate matter are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40CFR52.21 will not apply.

D.1.2 Overall Source Limit

The input of grain is limited to 28.0 million bushels of grain per twelve (12) consecutive month period.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for P1, P2, P3, P4, P5, P6A, P6B, P7, P8 and P9 and their control devices.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.4 Particulate Matter (PM)

The baghouses, telescoping spout and spouts for PM control shall be in operation at all times when P1, P3, P5, P6A and P6B are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of S-1, S-2 and S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the grain merchandising operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the truck only receiving and the grain handling areas, at least once per day when the truck only receiving and the grain handling processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the S-1, S-2 and S-4 stack exhaust.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:

Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(1) Inlet and outlet differential static pressure; and

(2) Cleaning cycle: frequency and differential pressure.

(c) To document compliance with Condition D.1.2, the Permittee shall maintain records of the grain throughput.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEARCARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.
THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____
THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. : _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Consolidated Grain and Barge Co.**
Address:	**Bluff Road**
City:	**Mt. Vernon, Indiana 47620**
Phone #:	**812 - 838 - 6651**
MSOP #:	**129-12259-00014**

I hereby certify that Consolidated Grain and Barge Co. is

9 still in operation.

9 no longer in operation.

I hereby certify that Consolidated Grain and Barge Co. is

9 in compliance with the requirements of MSOP **129-12259-00014**.

9 not in compliance with the requirements of MSOP **129-12259-00014**.

Authorized Individual (typed):	**Michael R. Brown**
Title:	
Signature:	
Date:	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Consolidated Grain and Barge Co.
Source Address: Bluff Road, Mt. Vernon, Indiana 47620
Mailing Address: P.O. Box 547, Mt. Vernon, Indiana 47620-0547
Part 70 Permit No.: 129-12259-00014

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	**Consolidated Grain and Barge Co.**
Source Location:	**Bluff Road, Mt. Vernon, Indiana 47620**
County:	**Posey**
Construction Permit No.:	**MSOP 129-12259-00014**
SIC Code:	**5153**
Permit Reviewer:	**Paula M. Miano**

On July 13, 2000, the Office of Air Management (OAM) had a notice published in the Democrat, Mount Vernon, Indiana, stating that Consolidated Grain and Barge Co. had applied for a construction permit to construct and operate a grain merchandising plant with baghouses and telescoping spouts as control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the construction permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

1. Condition D.1.8 has been added to require compliance monitoring of the pressure drops of the baghouses. The requirement to maintain the pressure drop in a range indicative of normal operation will assure that the baghouses are operating properly to control PM emissions. The condition is as follows:

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the truck only receiving and the grain handling areas, at least once per day when the truck only receiving and the grain handling processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

2. Condition D.1.8(b) now D.1.9(b) has been revised to require record keeping for the addition of the pressure drop monitoring condition.

(b) ~~To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8 and the dates the vents are redirected~~.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:

Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(1) Inlet and outlet differential static pressure; and

(2) Cleaning cycle: frequency and differential pressure.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	**Consolidated Grain and Barge Co.**
Source Location:	**Bluff Road, Mt. Vernon, Indiana 47620**
County:	**Posey**
SIC Code:	**5153**
Operation Permit No.:	**MSOP 129-12259-00014**
Permit Reviewer:	**Paula M. Miano**

The Office of Air Management (OAM) has reviewed an application from Consolidated Grain and Barge Co. relating to the construction and operation of a grain merchandising plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) Truck Only Receiving Area, known as P1, installed in the first quarter of 1978, exhausted to stack S-1, controlled by baghouse C-1, capacity: 840 tons of grain per hour.

(b) One (1) Truck & Rail Receiving Area, known as P2, installed in the first quarter of 1978, with a maximum capacity: 420 tons of grain per hour.

(c) One (1) Grain Handling Area, known as P3, exhausted to stack S-2, installed in 1979, controlled by baghouse C-2, capacity: 1,260 tons of grain per hour.

(d) One (1) natural gas-fired grain dryer, known as P4, exhausted to S-4, installed in 1994, rated at 36.0 million British thermal units per hour, capacity: 84.0 tons of grain per hour.

(e) One (1) Barge Loadout Area, known as P5, installed in the first quarter of 1978, controlled by a telescoping spout, capacity: 500 tons of grain per hour.

(f) One (1), Truck Loadout Area, known as P6A, installed in the first quarter of 1978, controlled by a spout extension, capacity: 336 tons of grain per hour.

(g) One (1) Truck and Rail Loadout Area, installed in 1978, known as P6B, controlled by a spout, capacity: 375 tons per hour.

(h) Two (2) storage tanks, installed in 1978, capacity: 500 gallons of fuel oil each.

(i) Three (3) natural gas-fired combustion sources, installed in the first quarter of 1978, rated at: 1.0 million British thermal units per hour, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following equipment:

(j) One (1) North Merchandising House - Receiving, known as P7, capacity: 336 tons of grain per hour.

(k) One (1) North Merchandising House - Conveying, known as P8, capacity: 336 tons of grain per hour.

(l) One (1) North Merchandising House - Loadout, known as P9, capacity: 280 tons of grain per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) 65-03-91-0186 issued September 21, 1987;

(b) 65-03-91-0187 issued September 21, 1987;

(c) 65-03-91-0188 issued September 21, 1987, and

(d) 65-03-91-0189 issued September 21, 1987.

All conditions from previous approvals were incorporated into this permit.

Source Definition

Review Request 129-11237-00014 for Consolidated Grain and Barge Company has determined that a merchandising house located near the soybean oil extraction plant is a separate source. The merchandising house and soybean oil extraction plant are considered separate sources based on the following:

(a) The two (2) sources have different Standard Industrial Classification (SIC) codes. The SIC code for the soybean extraction plant is 2057, and the SIC code for the merchandising house is 5153.

(b) Less than fifty percent (50%) of the soybeans processed at the extraction plant are stored at the merchandising house storage area for any length of time.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S-1	P1 Truck Only Receiving	40	4.2	24,500	70
S-2	P3 Grain Storage and Handling	5	2.5	8,500	70
S-4	P4 Grain Dryer	80	71	111,000	200

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation of this grain merchandising plant be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 9, 2000.

Emission Calculations

See pages 1 through 12 of Appendix A of this document for detailed emissions calculations.

For existing country grain elevators, the EPA has determined that a reasonable and realistic “upper limit” estimate of the number of bushels of grain produced to be delivered to the elevator may be considered in identifying the “maximum capacity” of such elevators for the purpose of estimating their potential to emit. The EPA recommends that the PTE be determined based upon an estimate of the maximum amount of grain that could be received during a record crop year in the geographic area served by the elevator. The EPA believes that the highest amount of grain received during the previous 5 years, multiplied by 1.2, will constitute a realistic upper bound on the amount of grain a country elevator could receive. Although this calculation would result in a PTE of 18 million bushels per year the source has requested a 28 million bushels per year per limit.

Potential To Emit - Entire Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	230
PM_{10}	92.7
SO_2	0.090
VOC	0.870
CO	13.2
NO_X	15.8

HAPs	Potential To Emit (tons/year)
Benzene	0.0003
Dichlorobenzene	0.0002
Formaldehyde	0.012
Hexane	0.284
Toluene	0.0005
Lead	0.00008
Cadmium	0.0002
Chromium	0.0002
Manganese	0.00006
Nickel	0.0003
TOTAL	0.298

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM_{10} is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 emission data OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	23.4
PM_{10}	6.15
SO_2	0.00
VOC	0.00
CO	0.00
NO_X	0.00
HAP	Not Listed

Potential to Emit Of the Entire Source, After Controls

The table below summarizes the total potential to emit, reflecting all limits, of all the significant emission units at the source, after the proposed modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPS
Combustion	0.300	1.20	0.095	0.867	13.3	15.8	0.298
Grain Processing	56.7	26.5	0.00	0.00	0.00	0.00	0.00
Total Emissions	57.0	27.7	0.095	0.867	13.3	15.8	0.298

Note: The potential to emit reflects the 28.0 million bushel throughput limit.

County Attainment Status

The source is located in Posey County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Posey County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	**Emissions** (ton/yr)
PM	54.4
PM_{10}	26.7
SO_2	0.095
VOC	0.867
CO	13.2
NO_X	15.8

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the calculations submitted with the application for this permit.

Proposed Modification After Control

PTE from the proposed modification, after control, based upon the enforceable production limit.

Pollutant	**PM** (ton/yr)	**PM_{10}** (ton/yr)	**SO_2** (ton/yr)	**VOC** (ton/yr)	**CO** (ton/yr)	**NO_X** (ton/yr)
Proposed Modification	2.60	2.60	0.00	0.00	0.00	0.00
PSD Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M 129-12259-00014, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than one hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) any combination of HAPs is less than twenty-five (25) tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

(a) The Grain Elevator NSPS (40 CFR 60 Subpart DD) does not apply to the existing facilities since construction was initiated before the August 3, 1978 applicability date. The Grain Handling Area, P3, installed in 1979 did not increase the hourly grain handling capacity and therefore is exempt pursuant to 40 CFR 60.304(b)(4).

The new facilities P7, P8 and P9 are also not subject to 40 CFR 60 Subpart DD. Since the P7, P8 and P9 stand alone, have a permanent storage capacity less then 2.5 million bushels, and are not part of a grain terminal elevator, they are not regulated by 40 CFR 60 Subpart DD.

(b) The two (2) storage tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, 60.110a and 60.110b), Subparts K, Ka, and Kb, because each tank has a capacity less than 40 cubic meters.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

A Preventive Maintenance Plan is required for the grain merchandising operations because there are control devices and the allowable PM emission exceeds 10.0 pounds per hour.

326 IAC 2-6 (Emission Reporting)

This source is located in Posey County and the potential to emit PM_{10} is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) The particulate matter (PM) from the source shall be limited by the following:

(1) The particulate matter (PM) from P1, P2 and P3 shall be limited by the following:

The allowable PM emission rate from P1, P2 and P3, shall not exceed a total of 80.6 pounds per hour when operating at a process weight rate of 1260 tons per hour.

Baghouses C-1 and C-2 shall be in operation at all times P1 and P3 are in operation, in order to comply with this limit.

(2) The particulate matter (PM) from P4 shall be limited by the following:

The allowable PM emission rate from P4, shall not exceed 49.5 pounds per hour when operating at a process weight rate of 84.0 tons per hour.

(3) The particulate matter (PM) from P5 shall be limited by the following:

The allowable PM emission rate from P5, controlled by a telescoping spout, shall not exceed 69.0 pounds per hour when operating at a process weight rate of 500 tons per hour.

The telescoping spout shall be in operation at all times P5 is in operation, in order to comply with this limit.

(4) The particulate matter (PM) from P6A shall be limited by the following:

The allowable PM emission rate from P6A ,controlled by a spout, shall not exceed 64.3 pounds per hour when operating at a process weight rate of 336 tons per hour.

The spout shall be in operation at all times P6A is in operation, in order to comply with this limit.

(5) The particulate matter (PM) from P6B shall be limited by the following:

The allowable PM emission rate from P6B, controlled by a spout, shall not exceed 65.6 pounds per hour when operating at a process weight rate of 375 tons per hour.

The baghouse shall be in operation at all times P6B is in operation, in order to comply with this limit.

(6) The particulate matter (PM) from P7 and P8 shall be limited by the following:

The allowable PM emission rate from P7 and P8 shall not exceed 64.3 pounds per hour, each, when operating at a process weight rate of 336 tons per hour.

(7) The particulate matter (PM) from P9 shall be limited by the following:

The allowable PM emission rate from P9 shall not exceed 65.6 pounds per hour when operating at a process weight rate of 375 tons per hour.

(b) Interpolation and extrapolation of the data for the process weight rates in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), visible emissions shall not cross the property line of the source at or near ground level.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations.

Conclusion

The construction and operation of this grain merchandising plant shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 129-12259-00014.